

2. Most recently, on November 28, 2018, through a Joint Motion, the parties sought an additional extension of the referenced deadlines to facilitate the parties' additional exchange

and review of information concerning the issues related to the parties' dispute, in anticipation of a settlement meeting. *See* Doc. No. 21.

3. On November 29, 2018, the Court granted the Joint Motion, setting February 11, 2019 as the deadline for Defendants' to respond to Plaintiff's Complaint and March 15, 2019 as the deadline for the parties to file a Joint Status Report. *See* Doc. No. 22.

4. Since then, the parties have nearly completed their exchange of information and they have continued to work toward resolving this matter.

5. Further, the parties now plan to meet in-person in March to discuss the information that has been exchanged over the last several months and their respective positions, with the shared hope of resolving this matter.

6. The parties therefore seek an additional modest extension of deadlines to allow them to prepare for the March meeting and engage in further communications that might lead to a consensual resolution of the litigation.

7. The proposed extension will not affect any deadlines, as there is no scheduling order in this case yet.

8. All parties join this motion.

WHEREFORE, the parties jointly ask the Court to extend the deadline for Defendants to file an answer or motion, or otherwise respond, to Plaintiff's complaint from February 11, 2019, until April 11, 2019, and to extend the deadline for the filing of a Joint Status Report from March 15, 2019, to May 14, 2019.

Dated: February 8, 2019.

Respectfully submitted by:

Richards & Connor

/s/Phil R. Richards

Phil R. Richards, OBA #10457
Randall J. Lewin, OBA #16518
Casper J. den Harder, OBA #31536
ParkCentre Building, 12th Floor
525 South Main Street
Tulsa, OK 74103-4509
Phone: 918-585-2394
Facsimile: 918-585-1449
Email: prichards@richardsconnor.com
rlwin@richardsconnor.com
cdenharder@richardsconnor.com

Attorneys for Plaintiff TIG Insurance Co.,
as successor-in-interest to
International Insurance Co.

And

/s/ Michael J. Gibbens

Michael J. Gibbens, OBA #3339
CROWE & DUNLEVY
A Professional Corporation
500 Kennedy Building
321 South Boston Avenue
Tulsa, Oklahoma 74103-3313
(918) 592-9840
(918) 592-9801 (Facsimile)
mike.gibbens@crowedunlevy.com

Barry Buchman, DC Bar No. 459663
HAYNES AND BOONE, LLP
800 17th Street, NW, Suite 500
Washington, DC 20006-3962
(202) 654-4574
(202) 654-4271 (Facsimile)
barry.buchman@haynesboone.com

ATTORNEYS FOR DEFENDANTS
FKI INDUSTRIES INC. AND
ACCO MATERIAL HANDLING
SOLUTIONS, INC.

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of February, 2019, I electronically transmitted the foregoing document to the Court Clerk using the ECF system of filing, which will transmit a Notice of Electronic Filing to the following ECF registrants:

Phil R. Richards
Randall J. Lewin
Casper J. den Harder
Richards & Connor
ParkCentre Building, 12th Floor
525 South Main Street
Tulsa, OK 74103-4509
prichards@richardsconnor.com
rlewin@richardsconnor.com
cdenharder@richardsconnor.com

ATTORNEYS FOR PLAINTIFF

/s/ Michael J. Gibbens